

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

NINGSI, as Special Administrator of the Estate of)
Paul Ferdinand Ayorbaba, deceased)

Plaintiffs,)

v.)

THE BOEING COMPANY,)

Defendant.)

Case No. 1:19-CV-01695

MOTION TO SUBSTITUTE COUNSEL

Plaintiff, Ningsi, as Special Administrator of the Estate of Paul Ferdinand Ayorbaba, deceased, by and through her attorneys PodhurstOrseck, P.A. and Hays Firm LLC, and for her Motion to Substitute Counsel, states as follows:

1. The Plaintiff, Ningsi, retained PodhurstOrseck, P.A. to represent her in this case on January 19, 2019.

2. On March 21, 2019, PodhurstOrseck, P.A., filed a complaint on Plaintiff Ningsi's behalf.

3. Over the past several months, PodhurstOrseck, P.A., engaged in mediation on Plaintiff's behalf, including two in-person mediation sessions with Boeing. This mediation resulted in a settlement of Plaintiff Ningsi's case on September 19, 2019. Ningsi approved the settlement on that same date.

4. On September 23, 2019, this Court granted an Order substituting Podhurst Orseck, P.A. as counsel and appointing Girardi Keese and Edelson PC. This Order was

entered *after* settlement was reached and agreed to by Plaintiff on September 19, 2019, and it was contrary to Plaintiff Ningsi's wishes.

5. PodhurstOrseck, P.A. continues to represent Plaintiff.


6. Plaintiff has asked her lawyers at Podhurst Orseck, P.A. and the Hays Firm LLC to continue to represent her and to re-file their appearance on her behalf in this matter in the place of and instead of Girardi Keese and Edelson PC.

7. Plaintiff has expressed her desire to be represented by PodhurstOrseck, P.A. (as she has been for nearly ten months) to Girardi Keese, Edelson PC, PodhurstOrseck, P.A., and Hays Firm, LLC.

8. Accordingly, Plaintiff seeks an Order from this Court granting PodhurstOrseck, P.A. and the Hays Firm LLC leave to re-file their appearance in this matter on behalf of the Plaintiff in place of, and as substitute for Girardi Keese and Edelson PC. A copy of the Proposed Order is attached hereto as Exhibit A.

WHEREFORE, Plaintiff, NINGSI, as Special Administrator of the Estate of Paul Ferdinand Ayorbaba, deceased respectfully requests that this Court enter an Order withdrawing the appearance of Girardi Keese and Edelson PC and granting PodhurstOrseck, P.A. and Hays Firm LLC leave to re-file their appearance on behalf of the Special Administrator in the present matter.

Dated this 16th day of October, 2019.

A handwritten signature in blue ink, appearing to be 'Ningsi', is located on the right side of the page, next to paragraph 8.

Admitted Pro Hac Vice

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Respectfully Submitted,

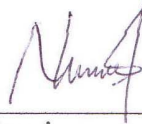
NINGSI

By: /s/ Andrew T. Hays
Andrew T. Hays



VERIFICATION

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing statements set forth in this "Motion for Leave to Substitute Counsel" are true and correct, to the best of my personal knowledge. Executed on October 17, 2019.



Ningsi



CERTIFICATE OF SERVICE

I hereby certify that on **October 17, 2019**, I electronically filed this **MOTION TO SUBSTITUTE COUNSEL** with the Clerk of the Court using the CM/ECF system, which will send notification of such filing upon all counsel of record via CM/ECF.

/s/ Andrew T. Hays

Attorney for Plaintiff

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